

William P. Weintraub  
Gregory W. Fox  
GOODWIN PROCTER LLP  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
T: 212-813-8800  
E: wweintraub@goodwinprocter.com  
E: gfox@goodwinprocter.com

*Designated Counsel for Ignition Switch  
Pre-Closing Accident Plaintiffs*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

### **NOTICE OF APPEAL**

The Ignition Switch Pre-Closing Accident Plaintiffs,<sup>1</sup> by and through Designated Counsel,<sup>2</sup> hereby appeal to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. § 158(a) and Rules 8002 and 8003 of the Federal Rules of Bankruptcy Procedure, from the *Judgment*, dated June 1, 2015 (ECF No. 13177) (the “**Judgment**”) and *Decision on Motion to Enforce Sale Order*, dated April 15, 2015 (ECF No. 13109) (the “**Decision**”).

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Judgment. As defined in the Judgment, “**Ignition Switch Pre-Closing Accident Plaintiffs**” means the subset of the Pre-Closing Accident Plaintiffs that had the Ignition Switch in their Subject Vehicles (each term as defined in the *Agreed and Disputed Stipulations of Fact Pursuant to the Court’s Supplemental Scheduling Order, Dated July 11, 2014*, filed Aug. 8, 2014 [ECF No. 12826], at 3).

<sup>2</sup> Goodwin Procter LLP was engaged by Co-Lead Counsel in *In re: General Motors Ignition Switch Litigation* (14-MD-2543 (JMF)) to address certain issues of bankruptcy law affecting the Ignition Switch Pre-Closing Accident Plaintiffs.

A copy of the Judgment is annexed hereto as **Exhibit A** and a copy of the Decision is annexed hereto as **Exhibit B**.

The parties to the Judgment and the Decision appealed from, and the names, addresses, and telephone numbers of their respective attorneys are as follows:

<b>Party</b>	<b>Attorneys</b>
Ignition Switch Pre-Closing Accident Plaintiffs	<b>GOODWIN PROCTOR LLP</b> William P. Weintraub Gregory W. Fox The New York Times Building 620 Eighth Avenue New York, NY 10018 T: 212-813-8800 E: WWeintraub@goodwinprocter.com E: GFox@goodwinprocter.com
Ignition Switch Plaintiffs	<b>BROWN RUDNICK LLP</b> Edward S. Weisfelner David J. Molton May Orenstein Howard S. Steel Seven Times Square New York, New York 10036 T: 212-209-4800 E: eweisfelner@brownrudnick.com E: dmolton@brownrudnick.com E: morenstein@brownrudnick.com E: hsteel@brownrudnick.com  <b>STUTZMAN, BROMBERG, ESSERMAN &amp; PLIFKA, P.C.</b> Sander L. Esserman 2323 Bryan Street, Suite 2200 Dallas, Texas 75201 T: 214-969-4900 E: esserman@sbep-law.com

Party	Attorneys
Groman Plaintiffs	<b>GOLDENBOCK, EISEMAN, ASSOR, BELL &amp; PESKOE, LLP</b> Jonathan L. Flaxer S. Preston Ricardo 437 Madison Avenue New York, New York 10022 T: 212-907-7300 E: jflaxer@golenbock.com E: pricardo@golenbock.com
General Motors LLC (New GM)	<b>KING &amp; SPALDING LLP</b> Arthur J. Steinberg Scott I. Davidson 1185 Avenue of the Americas New York, New York 10036 T: 212-556-2100 E: asteinberg@kslaw.com E: sdavidson@kslaw.com  <b>KIRKLAND &amp; ELLIS LLP</b> Richard C. Godfrey Andrew B. Bloomer 300 North LaSalle Chicago, Illinois 60654 T: 312-862-2000 E: rgodfrey@kirkland.com E: abloomer@kirkland.com
Wilmington Trust Company, as GUC Trust Administrator	<b>GIBSON, DUNN &amp; CRUTCHER, LLP</b> Lisa H. Rubin Matthew Williams Adam H. Offenhartz Aric H. Wu Keith R. Martorana 200 Park Avenue New York, New York 10166 T: 212-351-3845 E: lrubin@gibsondunn.com E: mjwilliams@gibsondunn.com E: aoffenhartz@gibsondunn.com E: awu@gibsondunn.com E: kmartorana@gibsondunn.com

Party	Attorneys
Participating GUC Trust Unit Trust Holders	<b>AKIN, GUMP, STRAUSS, HAUER &amp; FELD, LLP</b> Daniel Golden Deborah J. Newman Jamison A. Diehl Naomi Moss One Bryant Park New York, New York, 10036 T: 212-872-1000 E: dgolden@akingump.com E: djnewman@akingump.com E: jdiehl@akingump.com E: nmoss@akingump.com

Dated: June 10, 2015  
New York, New York

Respectfully submitted,

**GOODWIN PROCTER LLP**

By: /s/ William P. Weintraub  
William P. Weintraub  
Gregory W. Fox  
GOODWIN PROCTER LLP  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
T: 212-813-8800  
E: wwweintraub@goodwinprocter.com  
E: gfox@goodwinprocter.com

*Designated Counsel for Ignition Switch  
Pre-Closing Accident Plaintiffs*